

PART A OF THE SUPPORTING STATEMENT

**INFORMATION COLLECTION REQUEST
(EPA ICR Number 1885.01)**

IAQ Practices in Schools Survey

U.S. Environmental Protection Agency
Office of Radiation and Indoor Air
Indoor Environments Division

INFORMATION COLLECTION REQUEST (EPA ICR Number 1885.01)

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SECTION I – IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

IAQ Practices in Schools Survey

1(b) Short Characterization (Abstract)

Title IV of the Superfund Amendments and Reauthorization Act of 1986 (SARA) gives the U.S. Environmental Protection Agency (EPA) broad authority to research indoor air quality (IAQ) issues, develop and disseminate information on indoor air quality, and coordinate efforts at the Federal, state, and local levels. As part of this ongoing effort, the Indoor Environments Division (IED) of EPA's Office of Radiation and Indoor Air developed low-cost guidance for schools, entitled *IAQ Tools for Schools*, to assist school staff in preventing, identifying, and solving indoor air quality problems. EPA has distributed approximately 30,000 kits to date, over half of them to individual schools.

EPA proposes to collect data from individual schools throughout the United States using a four-page survey (see Appendix 1). This survey will be used to gain information regarding the number of schools that have implemented sound IAQ-management practices, such as those activities recommended in *IAQ Tools for Schools*. These data are essential for measuring the effectiveness of EPA's outreach efforts against the Agency's established Government Performance Results Act (GPRA) goal. The goal is to have "15% of the nation's schools adopt good indoor air quality practices consistent with EPA's *IAQ Tools for Schools*." This should result in 16,650 of the nation's public and private schools working towards achieving the implementation of sound IAQ practices by 2005. EPA intends to survey schools twice during the period for which this ICR is in effect—once in the first year and again in the third. Each survey distribution cycle will be conducted in the same manner, using the same survey instrument and protocol and relying on the same statistical assumptions regarding response and precision. In each cycle, EPA will survey 1,005 schools selected randomly from a potential pool of all public and private schools operating in the United States during the school year immediately preceding the year in which the survey is conducted. (For example, schools surveyed in 2001 will be selected

from a registry of schools operating in the 1999-2000 school year.) A total of 2,010 schools will be surveyed. This sample size will allow the Agency to develop the statistical data needed to chart its progress towards meeting its GPRA goal. By conducting two survey distribution cycles, EPA will also be able to measure the effects of its outreach efforts to encourage schools to adopt sound IAQ-management practices.

EPA will initially mail a survey and instructions for completing it to each randomly-selected school. Schools will be given up to 30 days to respond. At the end of this period, any school that has not responded by mail will be contacted by telephone. School personnel will be reminded of the survey, encouraged to complete it, and given the option of responding by telephone. If a school chooses to respond by telephone, an appointment will be scheduled and EPA contractor personnel will conduct the survey. Questions asked in the telephone interview will be identical to those contained in the original survey.

EPA expects that approximately 80 percent¹ of the schools surveyed will submit a survey response; 49.9 percent of schools will respond by mail and 50.1 percent of schools will provide their responses by telephone. All survey data, regardless of how they are obtained, will be entered into a database designed to track the results. This database will be administered by EPA contractor personnel.

This survey effort is expected to cost respondents \$35,886² and involve approximately 1,612³ school administrators and personnel. In addition to providing data on EPA's attainment of its GPRA goal for the implementation of sound IAQ-management practices in schools, EPA will use the data collected to evaluate the effectiveness of *IAQ Tools for Schools* and other outreach efforts and to select future initiatives that will further the implementation of IAQ-management practices in schools. If necessary, EPA will resurvey schools in 2005 to determine whether the Agency has met its GPRA goal. It is

¹Surveys which include a telephone component have achieved an average response rate of 75 percent. For example, response rates of 74 percent were found in election surveys conducted between 1952 and 1992 (Luevano 94). Similarly, response rates averaged 76 percent in General Social Surveys conducted between 1975 and 1993 (Smith 94). In addition, delivery methods which increase the perceived importance of the survey, such as certified mail, special delivery, or 2-day priority mail, have proven effective in increasing the overall response rate (Dillman 96). The survey will be distributed using an overnight delivery service, FedEx, and will include a follow-up telephone reminder call. Consequently, EPA anticipates a total response rate of approximately 80 percent.

²See Table 6.15

³See Table 6.15

important to note that the survey is designed to measure the *use* of sound IAQ-management practices in schools, rather than the indoor air quality of the schools themselves.

SECTION II – NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Title IV of the Superfund Amendments and Reauthorization Act of 1986 (SARA) gives EPA broad authority to research IAQ issues, develop and disseminate information on indoor air quality, and coordinate IAQ efforts at the Federal, state, and local levels. (Appendix 2 contains a copy of the relevant sections of this statute.) The *IAQ Tools for Schools* guidance was developed to assist schools in identifying, preventing, and solving IAQ problems. Collecting data on the implementation of practices identified in this guidance is necessary to determine the level of activity taken by schools to improve indoor air quality. Survey results can also be used to better focus EPA's outreach activities to schools.

In addition, the Government Performance Results Act of 1993 requires that Federal agencies develop and meet specific goals to measure the effectiveness of their programs. EPA has committed to a goal of achieving the implementation of sound IAQ practices in 15 percent, or 16,650, of the nation's public and private schools by 2005. This information request will assist EPA in assessing the level of implementation around the country. Not only will the survey demonstrate whether EPA is meeting its goal, it will also provide data on what IAQ practices are being utilized and help to identify activities recommended in *IAQ Tools for Schools* which require additional support or clarification from EPA.

2(b) Practical Utility/Users of the Data

The information collected in this survey effort will be used by EPA to evaluate the effectiveness of its efforts to encourage schools to improve indoor air quality. Specifically, the survey results will be used by EPA to: (1) assess the extent to which schools are implementing sound IAQ-management practices, such as those described in *IAQ Tools for Schools* or other EPA guidance documents, e.g., *Building Air Quality*; (2) determine whether EPA has met its goals under the GPRA for the implementation of sound IAQ practices; and (3) identify strengths and weaknesses of the guidance in terms of the ability of schools to implement suggested policies and procedures.

Section 4(b)i, Data Elements, discusses the particular data elements in the survey and the purposes of these elements.

SECTION III – NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

This is the first comprehensive attempt to collect information about the use of IAQ-management practices in our nation's schools. Schools are not required to submit any information concerning the indoor air quality of their facilities or any efforts to improve such quality to EPA or any other government agency. Therefore, this first-time information collection is non-duplicative of any past or ongoing EPA information collection effort.

3(b) Public Notice Required Prior to ICR Submission to OMB

EPA solicited public comments on this Information Collection Request (ICR) between **Month/Day, 2000** and **Month/Day, 2000**. A copy of the Federal Register document requesting comments is attached as Appendix 3.

3(c) Consultations

This ICR was completed in consultation with the following schools, school districts, and local health agencies:

1. Fort River Elementary School (Amherst, MA)
Russ Vernon-Jones, Principal
(413) 253-9731
2. Walpole Health Department (Walpole, MA)
Robin Chapell, Chairman
(508) 660-7321
3. Chicopee Public Schools (Chicopee, MA)
Jim Stefanik, Director of Maintenance

(413) 594-3417

4. Portsmouth School District (Portsmouth, NH)
Peter Torrey, Chairman
(603) 431-5080
5. Nashua Schools District (Nashua, NH)
Jeannette Kotopoulis, Facilities Director
(603) 594-4330
6. Burlington Board of Health (Burlington, MA)
Todd Dresser, Chairman
(781) 270-1956
7. Carlisle Public Schools (Carlisle, MA)
David Flannery, Facilities Director
(978) 369-6550
8. Griffin Memorial School (Litchfield, NH)
Linda Scott, Principal
(603) 424-5931
9. Timberlain Regional School District (Plaistow, NH)
Pete Taylor, Facilities Director
(603) 382-6119

3(d) Effects of Less Frequent Collection

The main objective of the *IAQ Practices in Schools Survey* is to determine whether EPA has met its GPRA goal by 2005. By surveying twice within a three-year period, EPA will be able to establish a baseline and determine the effectiveness of its outreach activities based on the percentage change between the first and second survey distribution cycles. The survey schedule allows EPA to obtain this information well in advance of 2005 and make mid-course corrections as necessary to ensure that the Agency meets its GPRA goal. In addition, it is unlikely that any school will be surveyed more than once during the period for which this ICR will be in effect. However, it is possible that, given two random samples of substantially identical pools of potential recipients, there may be some schools that will be surveyed twice. However, EPA considers this possibility to be acceptable due to the need for statistically-valid data and the relatively small burden the survey will place on schools.

3(e) General Guidelines

This voluntary information collection conforms to the Office of Management and Budget's (OMB) general guidelines on information collections. Under no circumstances will respondents be required to take any of the following actions:

- Report information to EPA more than quarterly
- Prepare a written response to a collection of information in fewer than 30 days after receipt of a request
- Submit more than an original and two copies of any document
- Retain records for more than three years
- Participate in a statistical study that is not designed to produce data that can be generalized to the universe of the study
- Utilize a statistical data classification that has not been reviewed and approved by OMB
- Receive a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use
- Submit proprietary, trade secret, or other confidential information unless EPA can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law

3(f) Confidentiality

EPA does not expect to receive confidential information from the schools voluntarily participating in the *IAQ Practices in Schools Survey*.

3(g) Sensitive Questions

The *IAQ Practices in Schools Survey* contains no sensitive questions.

SECTION IV -- THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

The *IAQ Practices in Schools Survey* will be sent to the school principal. EPA expects that the survey might be completed by a school's administrator or its IAQ Coordinator. From past experience, individuals who are most likely to be named IAQ Coordinators include school principals, building superintendents/facility managers, school nurses, and teachers. All of these professions fall into the following SIC code:

8211	Elementary and Secondary Schools
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4(b) Information Requested

4(b)i Data Elements

The *IAQ Practices in Schools Survey* will be sent to schools that have been randomly selected from a potential pool of all public and private schools operating in the United States during the school year immediately preceding that in which the survey is conducted. (For example, schools surveyed in 2001 will be selected from a registry of schools operating during the 1999-2000 school year.) A copy of the survey and instructions for completing it are attached to this ICR as Appendix 1 of the Supporting Statement.

The survey will request the following information from respondents:

Reporting Items

- General Information: These questions seek general information about the respondents and the schools for which they are responsible. Included in this section are questions concerning the type of school (public/private), the grade level (elementary/secondary), the size of the student and faculty populations, the size of the physical plant, the type of heating, ventilation, and air conditioning system used, and the outdoor ventilation rate of the school. These data are important to identifying trends in the types of schools utilizing good IAQ practices.

- **Implementation Activities:** These questions request information about the respondents' IAQ-management practices, including the adoption of specific practices recommended in *IAQ Tools for Schools* or other EPA IAQ guidance.
- **Barriers to Implementing IAQ-management Practices:** This question identifies potential barriers to implementing good IAQ-management practices and asks the respondents if they encountered any of them in their efforts to implement the activities suggested in the guidance.
- **Effects of IAQ-management Practices:** This question asks respondents to identify any positive effects, such as lower absenteeism or fewer asthma episodes, they may have observed as a result of their implementation of IAQ-management practices.

There are no record-keeping items specifically required by this survey. While maintaining records of repairs, upgrades, inspections, and the like is considered a sound IAQ-management practice, EPA does not require schools to maintain these records.

4(b)ii Respondent Activities

Schools who elect to participate in EPA's *IAQ Practices in Schools Survey* will perform the following tasks:

- Review Survey Instructions
- Compile Survey Information
- Complete Survey
- Mail Survey to EPA

These activities represent a voluntary information collection for each school and are not customary business practices of the respondents.

SECTION V – THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

Agency activities associated with the *IAQ Practices in Schools Survey* include the following:

- Develop Survey Form
- Pretest Survey Form

- Develop *IAQ Practices in Schools* Database
- Identify Target Schools (i.e., select random sample)
- Distribute Survey to Target Schools
- Collect Information from Respondents via Mail or Telephone
- Review Information Collected and Complete Data Entry
- Analyze Results
- Prepare Findings

5(b) Collection Methodology and Management

The *IAQ Practices in Schools Survey* is a four-page survey which elicits predominantly multiple choice responses. The survey was peer-reviewed by staff of EPA's IED and EPA Regional offices to ensure that the questions asked will reveal sufficient information to adequately evaluate the IAQ practices implemented in schools and to ensure that the questions do not collect redundant information. In addition, the survey instrument was pretested on behalf of nine schools by school principals, facility directors, building engineers, and health officials (see Section 3(c)). This pretest was conducted to ensure that the questions asked are clear and to obtain an estimate of the burden of response.

In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, and applicable database software. EPA will ensure the accuracy and completeness of collected information by reviewing each submission. Each survey form will be assigned a unique identifier to facilitate the tracking of survey responses within the project database. EPA will enter the survey results into a Microsoft Access database and aggregate the data to monitor the implementation of sound IAQ practices in schools. A double-entry protocol will be observed throughout data entry to ensure an accuracy rate of at least 99 percent. Under this protocol, each survey form will be entered into the database twice, after which a computer program designed to identify variances in the data entered will be run. Following data entry, a final review of survey responses will be performed to identify numerical outliers in individual responses and to ensure file completeness. Blank responses and outliers will be checked against the hard copies of the survey.

The results of each survey distribution cycle will be summarized and made available to the U.S. Congress during EPA's reporting of its GPRA goals. Additionally, IED will report to the Information Strategies Branch on the results of the survey process and, upon request, will make copies of the survey instrument and this ICR available as a reference for other EPA Program Offices undertaking large-scale survey and program evaluation efforts.

EPA considered the possibility of using an electronic bulletin board as a means of completing the survey. The Agency concluded, however, that the cost of developing a computerized survey instrument would likely outweigh the limited benefit of potentially reducing a relatively minimal burden to respondents (see Section 6(a)). In addition, EPA was concerned that all respondents might not have access to a computer.

5(c) Small Entity Flexibility

EPA does not believe that this ICR will have a “significant economic impact on a substantial number of small entities.” The *IAQ Practices in Schools Survey* is strictly voluntary and targeted to individual schools. Most of the respondents are expected to be public schools, which fall outside of the definition of a “small entity” provided in Section 601 of the Regulatory Flexibility Act.

5(d) Collection Schedule

Information collection will begin upon approval of this ICR and the assignment of an OMB control number to the survey instrument. The collection schedule for both survey distribution cycles is expected to follow the approximate time line presented below. This schedule will be adjusted as necessary to reflect the number of surveys distributed in the future.

<u>Activity</u>	<u>Time Line</u>
Mail surveys to respondents	Within 15 days of OMB approval of ICR
Begin telephone surveys with respondents who did not respond by mail	32 days after mailing of surveys (allowing two days for delivery of the survey)
Complete telephone surveys	30 days after telephone surveys begin
Complete data entry of survey results	30 days after completion of telephone surveys
Analyze survey findings	15 days after completion of data entry
Report survey findings	30 days after completion of survey-finding analysis

SECTION VI – ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

This section details the estimated burden to respondents participating in the EPA *IAQ Practices in Schools Survey*. The estimates of the time burden involved in responding to the survey are derived from the pretest, which provided information on the staff and time required to respond to the survey.

Tables 6.1 and 6.2 present a summation of the resulting respondent burden estimates.

Table 6.1 – Respondent Burden/Cost for Written Surveys

Activities	Burden Hours/Respondent ⁴
Review Survey Instructions	0.3
Compile Survey Information	0.4
Complete Survey	0.4
Mail Survey to EPA	0.2
Total	1.3 (78 minutes)

Table 6.2 – Respondent Burden/Cost for Telephone Surveys

Activities	Burden Hours/Respondent
Review Survey Instructions	0.3
Compile Survey Information	0.4
Complete Survey	0.1
Total	0.8 (48 minutes)

6(b)i Estimating Respondent Costs

⁴EPA recognizes that a small additional burden will be placed on those survey recipients who complete the survey by mail but who must be contacted in order to clarify or complete the information provided in their survey. EPA estimates that of the 402 recipients responding by-mail (per survey distribution cycle), approximately 25 percent, or 100 respondents, will require a follow-up telephone call. Of these, it is estimated that two-thirds, or approximately 67 respondents, will successfully be contacted. The Agency expects these follow-up telephone calls to last no more than five minutes. Therefore, given the small number of respondents involved and the limited time required, EPA did not include this burden in these estimates.

EPA estimated respondent costs using the burden estimates presented above in Section 6(a) and the average wage figures provided by the Bureau of Labor Statistics for each of the respondents' occupational categories. The average hourly wage rates for each respondent type are as follows:

School Principals	\$29.71 per hour
Building Engineers	\$18.40 per hour
School Nurses	\$19.56 per hour
Teachers	\$16.15 to 18.22 per hour

These figures were taken from the Department of Labor's Bureau of Labor Statistics Occupational Outlook Handbook, 2000-01 Edition, at <http://stats.bls.gov/ocohome.htm>. EPA used the average of these rate ranges to determine the hourly cost (labor plus overhead) of \$29.71 for administrator staff (i.e., school principals), \$18.40 for building engineering staff, \$19.56 for nursing staff, and \$17.19 for teaching staff. These wage rates will be used to estimate costs throughout the period for which this ICR will be in effect.

Tables 6.3 to 6.10 present the individual respondent costs associated with this ICR. The respondent costs are presented by respondent type and survey type. Table 6.11 summarizes the individual tables. To determine the respondent burden hours, EPA used the results of its survey pretest. The time spent on each activity was averaged across the nine respondents. The range of time spent on each activity is as follows:

Review Instructions	Five to 60 minutes
Compile Survey Information	Zero to 60 minutes
Complete Survey (Mail)	10 to 60 minutes (seven surveys)
Complete Survey (Phone)	Six to eight minutes (two surveys)
Mail Survey to EPA	Five to 40 minutes (seven surveys)

The average burden for each activity is presented in the charts that follow.

Table 6.3 – Individual Respondent Cost for Mail Surveys – School Principals

Activities	Burden Hours/Respondent	School Principals @ \$29.71/Hour
Review Instructions	0.3	\$ 8.90
Compile Survey Information	0.4	\$11.90
Complete Survey	0.4	\$11.90
Mail Survey to EPA	0.2	\$ 5.95
Total	1.3 (78 minutes)	\$38.65

Table 6.4 – Individual Respondent Cost for Mail Surveys – Building Engineers

Activities	Burden Hours/Respondent	Building Engineers @ \$18.40/Hour
Review Instructions	0.3	\$ 5.50
Compile Survey Information	0.4	\$ 7.35
Complete Survey	0.4	\$ 7.35
Mail Survey to EPA	0.2	\$ 3.70
Total	1.3 (78 minutes)	\$23.90

Table 6.5 – Individual Respondent Cost for Mail Surveys – School Nurses

Activities	Burden Hours/Respondent	School Nurses @ \$19.56/Hour
Review Instructions	0.3	\$ 5.85
Compile Survey Information	0.4	\$ 7.80
Complete Survey	0.4	\$ 7.80
Mail Survey to EPA	0.2	\$ 3.90
Total	1.3 (78 minutes)	\$25.35

Table 6.6 – Individual Respondent Cost for Mail Surveys – Teachers

Activities	Burden Hours/Respondent	Teachers @ \$17.19/Hour
Review Instructions	0.3	\$ 5.15
Compile Survey Information	0.4	\$ 6.90
Complete Survey	0.4	\$ 6.90
Mail Survey to EPA	0.2	\$ 3.45

Total	1.3 (78 minutes)	\$22.40
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**Table 6.7 – Individual Respondent Cost for Follow-up Phone Surveys –
School Principals**

Activities	Burden Hours/Respondent	School Principals @ \$29.71/Hour
Review Instructions	0.3	\$ 8.90
Compile Survey Information	0.4	\$11.90
Complete Survey	0.1	\$ 3.00
Total	0.8 (48 minutes)	\$23.80

**Table 6.8 – Individual Respondent Cost for Follow-up Phone Surveys -
Building Engineers**

Activities	Burden Hours/Respondent	Building Engineers @ \$18.40/Hour
Review Instructions	0.3	\$ 5.50
Compile Survey Information	0.4	\$ 7.35
Complete Survey	0.1	\$ 1.85
Total	0.8 (48 minutes)	\$14.70

**Table 6.9 – Individual Respondent Cost for Follow-up Phone Surveys –
School Nurses**

Activities	Burden Hours/Respondent	School Nurses @ \$19.56/Hour
Review Instructions	0.3	\$ 5.85
Compile Survey Information	0.4	\$ 7.80
Complete Survey	0.1	\$ 1.95
Total	0.8 (48 minutes)	\$15.60

**Table 6.10 – Individual Respondent Cost for Follow-up Phone Surveys –
Teachers**

Activities	Burden Hours/Respondent	Teachers @ \$17.19/Hour
Review Instructions	0.3	\$ 5.15
Compile Survey Information	0.4	\$ 6.90
Complete Survey	0.1	\$ 1.70

Total	0.8 (48 minutes)	\$13.75
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**Table 6.11 – Summary of Individual Respondent Costs by
Respondent and Survey Type**

Respondent and Survey Type	Individual Respondent Cost
Mail Survey – School Principals	\$38.65
Mail Survey – Building Engineers	\$23.90
Mail Survey – School Nurses	\$25.35
Mail Survey – Teachers	\$22.40
Average Respondent Cost for Mail Survey*	\$27.60
Follow-up Phone Survey – School Principals	\$23.80
Follow-up Phone Survey – Building Engineers	\$14.70
Follow-up Phone Survey – School Nurses	\$15.60
Follow-up Phone Survey – Teachers	\$13.75
Average Respondent Cost for Follow-Up Phone Survey*	\$16.95

*EPA has chosen to average respondent costs since the Agency has no way of estimating the distribution of respondents across occupation categories.

6(b)ii Estimating Capital, and Operations and Maintenance Costs

EPA does not expect respondents to the *IAQ Practices in Schools Survey* to incur any capital or operations and maintenance (O&M) costs. This information collection is voluntary and does not require special equipment. The only potential O&M costs to be incurred would be those associated with copying the completed survey for the school's records (if desired). EPA intends to enclose an EPA-flocked envelope, including postage, in which respondents may return the survey to EPA. The Agency estimates respondent costs to be less than \$.50 per survey.

6(b)iii Capital/Start-up vs. Operating and Maintenance Costs

Not applicable

6(b)iv Annualizing Capital Costs

Not applicable

6(c) Estimating Agency Burden and Costs

Table 6.12 provides the estimates of EPA's burden and costs associated with the *IAQ Practices in Schools Survey*. Wage estimates for Agency personnel are divided into three general categories of labor: Management (GS-15); Technical (GS-13); and Clerical (GS-7). EPA personnel participating in this survey effort are assumed to be management and technical personnel. Civil Service wage estimates are based on the FY 2000 pay scale for Washington, DC employees, and include a benefits multiplier of 1.6. These wage rates are used to estimate costs throughout the period for which this ICR is in effect. EPA contractor personnel will also support this survey effort, and their costs are calculated as an Agency burden. Wage rates used in this ICR include:

Civil Service (Manager)	\$73.55/Hour
Civil Service (Technical)	\$52.90/Hour
Contractor Personnel	\$63.00/Hour

EPA and contractor personnel will conduct the following activities:

Table 6.12 Agency Burden/Cost for *IAQ Practices in Schools Survey*
(Includes First and Second Survey Distribution Cycles)

Activities	Burden Hours			
	Manager @ \$73.55/Hour	Technical @ \$52.90/Hour	Contractor @ \$63.00/Hour	Total Hours
Develop Survey Form	0 hours	5 hours	15 hours	20 hours
Pretest Survey Form	0 hours	1 hours	15 hours	16 hours
Develop Survey Database	0 hours	10 hours	222 hours	232 hours
Distribute Surveys	0 hours	0 hours	24 hours	24 hours
Conduct Telephone Surveys	0 hours	0 hours	388 hours	388 hours
Data-enter Results	0 hours	0 hours	690 hours	690 hours
Analyze Results	0 hours	180 hours	360 hours	540 hours
Report Findings	24 hours	120 hours	480 hours	624 hours
Quality Assurance	0 hours	0 hours	90 hours	90 hours
Total Hours	24 hours	316 hours	2,284 hours	2,624 hours
Total Costs	\$1,765	\$16,716	\$143,892	\$162,373

In addition to the labor burden associated with the distribution of *IAQ Practices in Schools Survey*, EPA will also incur \$23,285 in other direct costs. These costs include supplies (envelopes and mailing labels), postage, delivery charges, and long distance charges.

6(d) Estimating the Respondent Universe and Total Burden and Costs

EPA anticipates distributing a survey to 2,010 schools in two separate survey cycles of 1,005 schools each. Of those potential respondents, EPA estimates 80 percent⁵, or 1,612 respondents, will elect to participate in this information-collection effort. Approximately 49.9 percent⁶ of respondents, or 804, are expected to respond by mail. The remaining 50.1 percent⁷ of respondents, or 808, will respond by telephone.

The bottom-line burden hours for this information collection effort are as follows:

Table 6.13 -- Individual Respondent Burden Totals (by mail)

Survey Activities	Time Required
Review Instructions	0.3 hours
Compile Survey Information	0.4 hours
Complete Survey	0.4 hours
Mail Survey to EPA	<u>0.2 hours</u>
Total	1.3 hours (78 minutes)

Total Annual Burden (of mail respondents) = (Total Hours x No. of Respondents) ÷ 3

⁵Of the 2,010 schools surveyed, EPA expects that 40 percent, or 804 schools, will respond to the survey by mail. EPA will attempt to contact the remaining 60 percent of schools (1,206 schools) by telephone to remind them of the survey and encourage them to participate. These schools will be given the opportunity to respond to the survey by telephone. EPA expect that two-thirds of the remaining schools, or 808 schools, will elect to respond to the survey by telephone. Consequently, EPA expects a total survey response rate of 80 percent (1,612 ÷ 2,010).

⁶804 mail responses ÷ 1,612 survey respondents = 49.9 percent of respondents

⁷808 telephone responses ÷ 1,612 survey respondents = 50.1 percent of respondents

$$(1.3 \text{ hours} \times 804 \text{ respondents}^8) \div 3 = \mathbf{348 \text{ Hours}}$$

$$\text{Average Individual Respondent Collection Cost (for mail-in responses)} = \mathbf{\$27.60/\text{Respondent}^9}$$

Total Annual Costs for All Respondents (who respond by mail): (Individual Respondent Collection Cost x No. of Respondents) \div 3

$$(\$27.60 \times 804) \div 3 = \mathbf{\$7,397}$$

Table 6.14 -- Individual Respondent Burden Totals (by phone)

Survey Activities	Time Required
Review Instructions	0.3 hours
Compile Survey Information	0.4 hours
Complete Survey	<u>0.1 hours</u>
Total	0.8 hours (48 minutes)

Total Annual Burden (of telephone respondents) = (Total Hours x No. of Respondents) \div 3

$$(0.8 \text{ hours} \times 808^{10}) \div 3 = \mathbf{215 \text{ Hours}}$$

$$\text{Average Individual Respondent Collection Cost (for telephone responses)} = \mathbf{\$16.95/\text{Respondent}^{11}}$$

Total Annual Costs for All Respondents (who respond by telephone): (Individual Respondent Collection Cost x No. of Respondents) \div 3

$$(\$16.95 \times 808) \div 3 = \mathbf{\$4,565}$$

Total Hourly Burden: (Respondent Hours Per Survey (Mail) x No. of Respondents) + (Respondent Hours Per Survey (Phone) x No. of Respondents)

$$(1.3 \times 804) + (.8 \times 808) = \mathbf{1,692 \text{ Hours}}$$

⁸See Footnote 3

⁹See Table 6.11

¹⁰See Footnote 3

¹¹See Table 6.11

Total Cost: (Individual Respondent Collection Cost (Mail Respondent) x No. of Respondents) +
(Individual Respondent Collection Cost (Phone Respondent) x No. of Respondents)
 $(\$27.60 \times 804) + (\$16.95 \times 808) = \mathbf{\$35,886}$

Table 6.15 -- Total Respondent Burden and Costs

Survey Type	Number of Respondents	Total Hours	Total Burden Costs
Mail	804	1,046	\$22,190
Phone	808	646	\$13,696
Total	1,612	1,692	\$35,886

The breakout for EPA activities associated for this survey effort can be found in Table 6.12. Table 6.16 details the bottom-line burden for EPA associated with this survey effort.

Table 6.16 -- EPA Bottom-line Labor Burden

Number of Hours	Hourly Rate	Total Costs
24	\$73.55 (Manager)	\$ 1,765
316	\$52.90 (Technical)	\$ 16,716
2,284	\$63.00 (Contractor)	\$143,892
Total		
2,624		\$162,373

6(e)i Bottom-Line Burden Hours and Cost Tables

Table 6.17 details the total bottom-line burden (respondent and EPA) associated with this survey effort. Table 6.12 in Section 6(c) Estimating Agency Burden and Costs and Tables 6.13 - 6.16 in Section 6(d), Estimating the Respondent Universe and Total Burden and Costs, detail how these total figures were derived.

Table 6.17 – Bottom-line Burden Hours and Cost

Burden Category	Burden Costs	Burden Hours
Respondent	\$ 35,886	1,692 hours
EPA Labor	\$162,373	2,624 hours
EPA Other Direct Costs	\$ 23,285	N/A

Total Bottom-line Burden	\$221,544	4,316 hours
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6(e)ii The Agency Tally

See Section 6(c), Estimating Agency Burden and Costs, for information on how the bottom-line Agency costs were derived.

6(e)iii Variation in the Annual Bottom-Line

Since the majority of respondents will only participate once in the *IAQ Practices in Schools Survey* during the clearance period requested, EPA does not expect any variation in the annual bottom-line.

6(f) Reasons for Change in the Burden

This section is not applicable since this is a new ICR.

6(g) Burden Statement

Public reporting burden for this collection of information is estimated to range between 0.8 and 1.3 hours, or from 48 to 78 minutes per response. This includes time for reviewing survey instructions, compiling survey information, completing the survey, and mailing the survey to EPA. The average respondent's response cost is \$27.60 for surveys completed by mail and \$16.96 for surveys completed by telephone.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden to the Director, Collection Strategies Division, Office of Environmental Information, (OEI), U.S. Environmental Protection Agency, MC 2822, 1200 Pennsylvania Avenue, NW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR Number 1885.01 in any correspondence.